

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

LIYANARA SANCHEZ, as next friend on behalf  
of FRENGEL REYES MOTA, *et al.*,

*Petitioners—Plaintiffs,*

J.G.G., *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*,

*Respondents—Defendants.*

Case No: 1:25-cv-00766-JEB

**DEFENDANTS' MOTION FOR AN EXTENSION**

Given substantial changes on the ground in Venezuela and the fluid nature of the unfolding situation, Defendants respectfully move for an extension to respond to this Court's Order (ECF 214) directing them to propose a remedy by Monday, January 5. Over the weekend, the United States apprehended Nicolas Maduro. As a result, the situation on the ground in Venezuela has changed dramatically. Defendants thus need additional time to determine the feasibility of various proposals. Defendants therefore request a 7-day extension to evaluate and determine what remedies are possible.

Dated: January 4, 2025

Respectfully submitted,

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Drew C. Ensign  
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/s/ Tiberius Davis

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